

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JANE DOE *et al.*,

) CASE NO. 1:07cv2787

)

)

)

) JUDGE DAN A. POLSTER

)

)

*Plaintiffs*

) **Motion to Extend Discovery Cutoff  
Date**

)

vs.

)

)

DEAN BOLAND

)

)

*Defendant*

)

Now come the Plaintiffs who respectfully move this Court for and order extending the deadline for discovery in this matter an additional sixty days. Plaintiffs' counsel was unexpectedly re-hospitalized on December 9, 2008 and underwent reconstructive surgery. Plaintiffs' counsel is currently hospitalized and expected to be released on January 21, 2009. For the reasons set forth above, Plaintiffs' counsel is respectfully seeking additional time to complete discovery in this matter.

Respectfully submitted,

/s/ Jonathan E. Rosenbaum

Jonathan E. Rosenbaum (Ohio Bar Reg. No. 021698)

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**Proof of Service**

A true and accurate copy of the foregoing has been electronically served this 12th day of January, 2009 by the Court's electronic filing system

/s/ Jonathan E. Rosenbaum  
JONATHAN E. ROSENBAUM  
Supreme Court Reg. No. 0021698  
Attorney for Plaintiffs